

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff/Defendant-in-Counterclaim,

v.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS, INC.
d/b/a FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION, FUTURE
MANAGEMENT BUSINESS TRUST, EDWARD
KENNEDY, BRIAN J. CULLINEY, D.C. and
JENNIFER MCCONNELL, D.C.,

Defendants.

Case No. 05-11693 RCL

STIPULATION

The parties to the above-referenced matter hereby stipulate and agree that: (1) the time for Defendants to file an opposition to Plaintiff/Counterclaim Defendant's Omnibus Motion to Dismiss Defendants/Counterclaim Plaintiffs' Counterclaims ("Defendants' Opposition") is extended up to and including Friday, March 30, 2007, and (2) Defendants shall not oppose any motion filed by Plaintiff/Counterclaim Defendant seeking leave to reply to Defendants' Opposition.

Respectfully Submitted
Encompass Insurance Company
By its attorneys,

/s/ Jay B. Kesten

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Respectfully Submitted
Brian Culliney and Jennifer McConnell
By their attorney,

/s/ Thomas M. Ciampa

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Respectfully Submitted

*Joseph D. Giampa, Frederick T. Giampa,
Advanced Spine Centers, Inc. d/b/a First Spine,
and Future Management Corporation*

By their attorneys,

/s/ Mathew J. Conroy

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Respectfully Submitted

Edward Kennedy
By his attorneys,

/s/ Jeffrey Philips

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Dated: March 23, 2007

Certificate of Service

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

____/s/ Thomas M. Ciampa____